

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

ERIC CERVINI *et al.*,

Plaintiffs,

v.

ELIAZAR CISNEROS *et al.*,

Defendants.

Case No. 1:21-cv-565-RP

**DEFENDANT STEVE AND RANDI CEH'S
REPLY IN SUPPORT OF MOTION FOR CONTINUANCE OF TRIAL**

It has come to the attention of undersigned counsel within the past 24 hours that Plaintiffs have, for over a year, withheld and failed to disclose written agreements with former defendants—and now Plaintiff witnesses—Hannah Seh and Kyle Kruger. This is a shocking omission. Not only does this constitute substantial grounds for the previously requested continuance, but also for the reopening of discovery for the narrow purpose of requiring Plaintiffs to produce all communications and agreements with Hannah Seh and Kyle Kruger.¹ Such obviously probative evidence of prejudice and bias of two of Plaintiffs' witnesses, who authored

¹ This is, of course, a new ground for continuance that was not previously raised, but has only just come to the attention of undersigned counsel, who is new to the case and coming up to speed. Because Plaintiffs did not have the opportunity to respond in their opposition, the Sehs do not object to a surreply on this limited issue.

declarations that are also included as Plaintiff exhibits, should have been identified and produced long ago.

And while Plaintiffs contend that the issues in this case are “streamlined,” and that new counsel should apparently have no trouble getting up to speed, their designation of 448 exhibits, including tens of hours (and tens of gigabytes) of deposition video suggests the opposite. It is apparent that overcomplicating this case is part of Plaintiffs’ legal strategy, taking a shock-and-awe approach with their veritable army of attorneys, bullying Defendants who have limited resources.

Defendants Steve and Rani Ceh respectfully request a brief continuance and to reopen discovery on the issue of Plaintiffs’ agreements and communications with Hannah Ceh and Kyle Kruger.

Dated: September 3, 2024

Respectfully submitted,

/s/ Jason C. Greaves
Jason C. Greaves, TBN 24124953
BINNALL LAW GROUP
717 King Street, Suite 200
Alexandria, Virginia 22314
(703) 888-1943
Fax: (703) 888-1930
jason@binnall.com

Attorney for Steve and Randi Ceh

CERTIFICATE OF SERVICE

I certify that on September 3, 2024, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jason C. Greaves
Jason C. Greaves, TBN 24124953

Attorney for Steve and Randi Ceh